

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA,)	Criminal No.: 2:24-cr-38
)	
Plaintiff,)	
)	
v.)	
)	
DEANGELO RAVENEL,)	
a/k/a "Fast Cash,")	
)	
Defendant.)	

AFFIDAVIT IN SUPPORT OF APPLICATION

I, James Godsil, a Special Agent with the Federal Bureau of Investigation, (hereinafter "FBI"), being duly sworn under oath, depose and state the following:

This Affidavit is submitted in support of an application for a seizure warrant for the following accounts:

- a. TD Bank Account Number 00006758969621, in the name of Deangelo Ravenel.
- b. TD Bank Account Number 00004330430870, in the name of Deangelo Ravenel.

AFFIANT'S QUALIFICATIONS

1. I, James Godsil am "a federal law enforcement officer" within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure, that is, a government agent who is engaged in enforcing the criminal laws and who is in a category of officers authorized by the Attorney General to request a search warrant. I have been employed with the FBI since March 2010. Since March of 2010, I have received training and experience in interviewing and interrogation techniques, arrest procedures, search and seizure, and narcotics. I am assigned to the FBI Charleston Low Country Violent Crimes Task Force investigating violent gangs operating inside and outside the borders of the United States. As a result of my law enforcement experience, I have

participated in investigations and prosecutions and have investigated violations of law involving controlled substance and firearms. I have conducted surveillance, arrested suspects, executed search warrants, seized evidence, prepared investigative reports, handled and debriefed informants, worked with cooperating defendants, monitored intercepted calls, questioned suspects and secured relevant information using numerous other investigative techniques. I have assisted with the preparation of cases for trial and has testified before the federal grand jury. Additionally, I have consulted with other agents and prosecuting attorneys in matters dealing with federal controlled substance and firearms violations and I have had training and experience in identifying and interdicting illegal controlled substances.

2. I have conducted investigations into the unlawful possession, importation, possession with intent to distribute, and distribution of controlled substances, and the conspiracies associated with these networks. Through the experience I have gained during my criminal investigations and additional training I have received, I have become familiar with the distribution methods used by controlled substance traffickers, including, but not limited to, the methods of importing, packaging, transferring and distributing controlled substances, the use of cellular telephones, pagers, the use of numerical codes, code words and other methods of avoiding detection by law enforcement, as well as the types and amounts of profits made by controlled substance traffickers and the methods, language and terms that are used to disguise the source and nature of the profits from their illegal controlled substance dealing.

3. I have become familiar with the manner and methods by which narcotics traffickers conduct their illegal business and the language and terms that are used to disguise conversations about their narcotics activities. Specifically, that in conducting their illegal business, drug traffickers often use distinctive methods, language, and terms which are used to disguise

conversations about their drug activities. I understand that narcotics traffickers rarely refer to heroin, cocaine, cocaine base, also known as crack, phencyclidine (PCP), Lysergic Acid Diethylamide (LSD) or other illegal drugs expressly by name. Instead, to conceal the true nature of their illegal activities and to thwart detection by law enforcement, narcotics traffickers routinely refer to drugs, drug quantities, and drug prices by using seemingly innocuous words or phrase.

4. The following paragraphs are furnished to establish probable cause in support of an application for a Seizure Warrant for TD Bank Account #00006758969621, in the name of Deangelo Ravenel and TD Bank Account # 00004330430870, in the name of Deangelo Ravenel. I am familiar with this investigation through personal knowledge and information provided by other Special Agents and Task Officers with the FBI. I have good reason to believe that all the information provided to me pertaining to this investigation is credible and true.

PROSECUTION OF DEANGELO RAVENEL

5. On February 25, 2020, a Federal Grand Jury in the District of South Carolina returned a multi-count superseding indictment against Ravenel. Ravenel was charged with conspiracy to distribute and distribution of 100 grams or more of a mixture or substance containing a detectable amount of heroin, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, in violation of Title 21 United States Code, Sections 841 (a)(1), (b)(1)(B) and 846; Possession with intent to distribute 500 grams or more of cocaine, in violation of Title 21 United States Code, Sections 841 (a)(1) and (b)(1)(B); Possession with intent to distribute 100 grams or more of heroin, 500 grams or more of cocaine and 28 grams or more of cocaine base, in violation of Title 21 United States Code, Sections 841(a)(1) and (b)(1)(B); Possession of a firearm in furtherance of a drug trafficking crime, in violation of Title 18 United States Code,

Section 924(c)(1)(A)(i); Possession of firearms and ammunition after having been convicted of a felony, in violation of Title 18 United States Code, Sections 922(g)(1), 924(a)(2) and 924(e); and Conspiracy to use a communication facility to facilitate drug felonies, in violation of Title 21 United States Code, Sections 841(a)(1), 843(b) and 846.

These offenses occurred between 2018 and May of 2020. The superseding indictment also included a forfeiture allegation which included a forfeiture judgment in the amount of \$150,000.00, totaling the sum of money equal to all property Ravenel obtained as a result of the drug offenses charged in the superseding indictment, and all interests and proceeds traceable. The forfeiture allegation further noted that the Government would pursue substitute assets pursuant to Title 21, United States Code, Section 853(p).

6. On September 24, 2020, a Bill of Particulars was filed with the court regarding property alleged in the Superseding Indictment filed February 25, 2020, as also being subject to forfeiture to the United States. Such property included: United States Currency/Bank Accounts: a. Approximately \$21,924.54 in TD Bank Account #: # xxxxx0870, Asset ID: 20-FBI-006039; b. Approximately \$786.04 in TD Bank Account #:xxxxx9621, Asset ID: 20-FBI-006040.

7. On February 8, 2021, Ravenel signed a plea agreement, agreeing to forfeiture, and on April 7, 2021, plead guilty to conspiracy to traffic drugs, in violation of Title 21, United States Code, Sections 841 and 846.

8. On April 29, 2021, United States District Judge David C. Norton entered a Preliminary Order of Forfeiture which included a personal forfeiture judgment against Ravenel in the amount of \$150,000.00 to be satisfied by *any* property belonging to Ravenel. The Preliminary Order of Forfeiture further provided for the forfeiture of the specific bank accounts sought for seizure through this affidavit including : (a) Approximately \$21,924.54 in TD Bank Account #: #

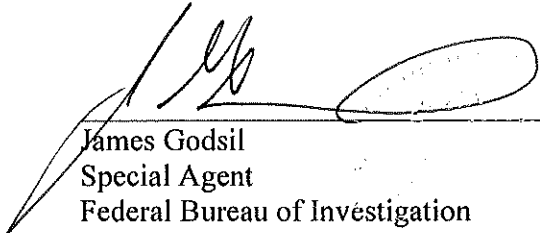
XXXXX0870, Asset ID: 20-FBI-006039 and (b) Approximately \$786.04 in TD Bank Account #:XXXXX9621, Asset ID: 20-FBI-006040. (ECF #809).

9. The Court sentenced Ravenel on August 18, 2021 and entered the criminal judgment incorporating the Preliminary Order of Forfeiture on September 2, 2021.

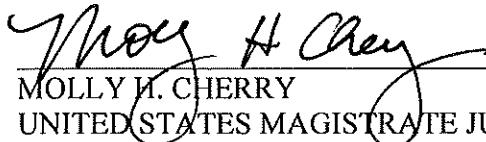
10. Based on the foregoing, I believe there is probable cause to seize for forfeiture the funds contained in Ravenel's TD Bank Accounts #00006758969621 and #00004330430870 as set forth in the Court's Preliminary Order of Forfeiture.

11. Accordingly, this Court should authorize the seizure of these TD Bank Accounts #00006758969621 and #00004330430870.

12. This affidavit has been reviewed by Assistant United States Attorneys Everett McMillian and Carrie Fisher Sherard.


James Godsil
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on January 31, 2022


MOLLY H. CHERRY
UNITED STATES MAGISTRATE JUDGE